

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING  
(PROPOSAL THIRTEEN)

Docket No. RM2015-7

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR ACCESS TO  
FURTHER MATERIALS FILED UNDER SEAL BY UNITED PARCEL SERVICE**  
(July 23, 2015)

At the initiation of this proceeding, the Postal Service filed certain materials under seal within USPS-RM2015-7/NP1, and then subsequently, at the request of UPS and upon direction by the Commission, filed additional material under seal on April 23, 2015 as USPS-RM2015-7/NP2. Representatives of UPS, in turn, sought and obtained access to that material under protective conditions. UPS previously filed one set of nonpublic materials on June 8, and UPS yesterday filed its second set of materials under seal as UPS-LR-RM2015-7/NP2.

When UPS filed its first set of nonpublic materials, the Postal Service sought and obtained access to those materials. Order No. 2538 (June 9, 2015). The Postal Service now requests similar access to the second set of materials as was granted in Order No. 2538. The circumstances presented, and the relief requested, are identical in both instances.

Therefore, the Postal Service respectfully requests access to UPS-LR-RM2015-7/NP2, consistent with the relief afforded in Order No. 2538.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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